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CLERK'S OFFICE, COURT OF
CENTRAL DISTRICT OF CALIFORNIA
SACRAMENTO, CALIFORNIA

6CA 0

4 UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA -
5
6 WESTERN DIVISION

7 DeAnn Johnson©,
8

Case No.: 2:25cv06562-FLA-(SKt)

9 Executor And Trustee Of Ecclesiastical Private
10 Irrevocable Trust, DeAnn Johnson© And
Claimant Appearing Specially, Private State
11 Californian Special Appearance Only – Not A
U.S. Citizen, Employee, Agent, Vessel,
12 Resident, Or Corporate Person

13 Claimant/Petitioner,

14 vs.

15 London Renee Johnson, Mark Anthony Glen Jr,
16 and does 1-10

17 Respondent

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19 VERIFIED COMPLAINT

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**VERIFIED AMENDED COMPLAINT FOR EMERGENCY INJUNCTIVE RELIEF,
CUSTODY PROTECTION, AND TRUST INTERFERENCE**

INTRODUCTION

1. DeAnn Johnson©, Executor and Trustee of her duly recorded Ecclesiastical Private
Irrevocable Trust (File No. 20240411797, Los Angeles County Recorder), appears in
honor, *sui juris*, and pursuant to natural law, trust law, and federal jurisdiction.

PLEADING TITLE - 1

2. DeAnn Johnson© brings this action to urgently protect minor Aliyah Nicole Johnson, born March 22, 2020 (“Aliyah”), from imminent and ongoing harm caused by Defendants London Renee Johnson (biological mother) and Mark Anthony Glen Jr. (“Glen”), a convicted Tier II registered sex offender with a history of sexual assault and grooming behavior.

3. DeAnn Johnson© is the lawful trustee and custodian responsible for safeguarding Aliyah's welfare, as beneficiary of the Ecclesiastical Private Irrevocable Trust.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1333, federal question jurisdiction, and supplemental jurisdiction over related state claims.
5. Venue is proper in this district because the minor child resides here, and the acts and omissions complained of occurred within this jurisdiction.

PARTIES

6. DeAnn Johnson© is a living woman, acting as Executor and Trustee of the Ecclesiastical Private Irrevocable Trust, representing the best interests of minor Aliyah Nicole Johnson.
7. Defendant London Renee Johnson is the biological mother of Aliyah, residing within this district.
8. Defendant Mark Anthony Glen Jr. is a convicted sex offender, registered as a Tier II offender, who resides within the jurisdiction and has known access to the minor child.
9. Defendants DOES 1 through 10 are unknown individuals who have participated in or aided in the wrongdoing alleged herein.

FACTUAL ALLEGATIONS

10. Aliyah Nicole Johnson is a named beneficiary of DeAnn Johnson© 's Ecclesiastical
3 Private Irrevocable Trust (File No. 20240411797), which is lawfully established and
4 recorded.
11. DeAnn Johnson© has been the primary caregiver, provider, and protector of Aliyah and
7 Defendant London for many years, acting under trust and natural law.
12. Defendant London has willfully interfered with DeAnn Johnson© 's lawful rights by
9 obstructing communication and visitation with Aliyah without just cause.
13. Defendant London has made false and defamatory statements to family and others to
11 damage DeAnn Johnson© 's reputation, while refusing mediation, evading service, and
12 concealing her location.
14. Defendant London knowingly exposed Aliyah to Defendant Glen, who has a criminal
15 history including conviction under California Penal Code § 289(d)(4) for sexual
16 penetration through fraud and misrepresentation.
15. Victim Teasha Renee Huddleston has submitted an affidavit attesting to sexual assault by
19 Defendant Glen during a professional massage session on June 30, 2017.
20. Despite losing his massage license, Defendant Glen continues to practice and groom
21 others, exhibiting alarming behavior toward Aliyah, including giving her a "promise
22 ring," suggestive of grooming.
24. Defendant London has refused to disclose Defendant Glen's criminal history and
25 registration status to DeAnn Johnson© or others responsible for Aliyah's safety.
26. Defendant Glen's ongoing presence around Aliyah constitutes a severe risk of harm,
27 emotional trauma, and violation of Aliyah's right to safety.

19. Aliyah has suffered emotional distress as a result, evidenced by uncontrollable crying during the last communication with DeAnn Johnson©.

20. Defendant London's persistent denial of accountability and spread of falsehoods compound the harm to Aliyah and DeAnn Johnson©.

CAUSES OF ACTION

FIRST CAUSE OF ACTION

(Emergency Injunctive Relief and Protective Custody)

21. DeAnn Johnson© seeks immediate relief to restrain Defendant Glen from any contact with Aliyah, and for temporary custody to protect Aliyah's welfare.

SECOND CAUSE OF ACTION

(Breach of Fiduciary Duty and Trust Interference)

22. Defendant London's conduct breaches her fiduciary duties under trust and family law, unlawfully interfering with DeAnn Johnson© 's rights as Trustee.

THIRD CAUSE OF ACTION

(Defamation and Intentional Infliction of Emotional Distress)

23. Defendant London's false accusations and defamatory statements have caused DeAnn Johnson© severe emotional distress.

1 **FOURTH CAUSE OF ACTION**

2 (Violation of Minor's Right to Safe Custody and Contact)

3 24. Defendants' actions deny Aliyah her constitutional and common law rights to safety,
4 care, and contact with lawful custodians.

5 **REQUEST FOR RELIEF**

6 WHEREFORE, DeAnn Johnson© respectfully requests that the Court:

7

8 a. Issue a Temporary Restraining Order barring any contact between Defendant Mark Anthony
9
10 Glen Jr. and minor Aliyah Nicole Johnson;

11 b. Award DeAnn Johnson© temporary legal and physical custody of Aliyah, with supervised
12 visitation granted to Defendant London;

13 c. Order Defendants to cease all defamation and interference with the trust;

14 d. Impose sanctions and hold Defendants liable for damages resulting from their malicious
15 conduct;

16 e. Seal the case records to protect Aliyah's privacy;

17 f. Enter default judgment should Defendants fail to respond;

18 g. Grant such other relief as the Court deems just and proper.

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24 **VERIFICATION**

25 I, DeAnn Johnson©, affirm pursuant to 28 U.S.C. § 1746, that I have read the foregoing Verified
26 Amended Complaint and that the facts stated therein are true and correct to the best of my
27 knowledge and belief.

28 PLEADING TITLE - 5

1 Respectfully affirmed,

2 All rights reserved, none waived.

3 Executed this 16th day of July 2025, in Lancaster, California.

4
5 bye:


6 DeAnn Johnson ©

7 DeAnn Johnson©
8 Settlor, Executor, and Trustee of the
9 DE ANN JOHNSON
10 Ecclesiastical Irrevocable Living Trust
11 ALL Rights Reserved Without Recourse
12 UCC 1-308 Private American, Great-Grandmother of the Beneficiary